

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	Criminal Case No. 22-cr -25-JL-01/2
v.)	
)	Counts 1-5: Bank Fraud
KATIE M. RICKER and)	(18 U.S.C. § 1344(2))
WILLIAM HILL, JR.,)	
)	
Defendants)	

INDICTMENT

The Grand Jury Charges:

Background Information

At all times relevant to this Indictment:

1. Woodsville Guaranty Savings Bank (“Woodsville Bank”) is a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which are insured by the Federal Deposit Insurance Corporation (“FDIC”). Woodsville Bank has branches only in New Hampshire.
2. Passumpsic Bank is a financial institution as defined by Title 18, United States Code, Section 20, the deposits of which are insured by the FDIC. Passumpsic Bank has branches in New Hampshire and Vermont.
3. Company A is a business located in Sugar Hill, New Hampshire. Company A maintained a bank account at Woodsville Bank.
4. From in or around 2018 through in or around October 2021, defendant KATIE RICKER (“RICKER”) was employed in various positions by Company A. RICKER was the Assistant Manager for Company A in October 2021.

5. Defendant WILLIAM HILL, JR. (“HILL”) and RICKER had a close personal relationship.

6. RICKER and HILL maintained a joint account at Passumpsic Bank with an account number ending in 4919.

7. Employee 1 was the Manager for Company 1 and was authorized to sign checks for Company A.

The Scheme and Artifice to Defraud

8. Beginning at an unknown date but at least from in or around October 2021 and continuing through in or around December 2021, RICKER and HILL knowingly and willfully executed and attempted to execute a scheme and artifice to obtain money and property under the custody or control of Woodsville Bank by means of materially false and fraudulent pretenses, representations, and promises.

9. Specifically, in or about October 2021, RICKER stole blank checks belonging to Company A. She wrote fraudulent checks addressed to herself, HILL, and others to transfer money from Company A’s account at Woodsville Bank into the joint account ending in 4919 at Passumpsic Bank that she and HILL controlled. RICKER forged the signature of Employee 1 in drafting the checks. RICKER and HILL endorsed these checks.

10. Through this scheme, the defendants stole more than \$51,000 from Company A that was in the custody and control of Woodsville Bank.

COUNTS ONE THROUGH FIVE
[18 U.S.C. § 1344(2) – Bank Fraud]

11. On or about the dates charted below, in the District of New Hampshire and elsewhere, the defendants,

KATIE RICKER and
WILLIAM HILL, JR.,

executed and attempted to execute a scheme and artifice to obtain money and funds under the custody and control of Woodsville Bank by cashing or depositing fraudulent checks drawn against Company A's account at Woodsville Bank into their joint account ending in 4919 at Passumpsic Bank.

Count	Defendant	Date	Amount	Transaction
1	Ricker	11/29/2021	\$4,000.00	Deposited into Joint Account
2	Ricker	12/15/2021	\$2,561.25	Cashed out \$1,280; deposited \$1,281.25 into Joint Account
3	Ricker	12/21/2021	\$2,545.95	Deposited into Joint Account
4	Hill	12/18/2021	\$2,642.53	Deposited into Joint Account
5	Hill	12/20/2021	\$1,642.38	Cashed out \$820; deposited \$822.38 into Joint Account

All in violation of Title 18, United States Code, Section 1344(2).

NOTICE OF FORFEITURE

Upon conviction of one or more of the offenses set forth in Counts One through Five of this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C.

§ 982(a)(2), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

All in accordance to 18 U.S.C. § 982(a)(2) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

Dated: March 7, 2022

/s/ Foreperson
FOREPERSON

JOHN J. FARLEY
UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen
Alexander S. Chen
Special Assistant U.S. Attorney